

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

JELENA LIU,

)

)

Plaintiffs,

)

)

v.

)

No. 1:25-cv-716-JPH-TAB

)

KRISTI NOEM, *et al.*,

)

)

Defendants.

)

Declaration of Jelena Liu

Jelena Liu, being duly sworn upon her oath, says that:

1. I am an adult person residing in Indianapolis, Indiana.
2. I am a student in the second year of a two-year graduate program at Indiana University in Indianapolis in human computer interaction.
3. I am a citizen of China.
4. I received F-1 status in 2016 for my undergraduate studies at then-IUPUI.
5. I attended IUPUI where I initially pursued the major that had been chosen by my family. However, this was not a good fit and I began to experience depression and I switched to a new major.
6. My advisor at IUPUI advised me to ease my course load to support my mental health.

7. I did not realize it, but in lowering my course load I mistakenly dropped too many classes to maintain my F-1 status.

8. I discovered this when I attempted to return to the United States from China after winter break and discovered that my F-1 visa had been revoked.

9. I applied to have my F-1 visa reinstated and that was approved and my visa was reissued in 2018.

10. I completed my undergraduate studies in 2022 and I started my graduate studies in January of 2024.

11. I have had my F-1 status continuously since that time.

12. I do very well in school. I currently have a 3.42 grade point average.

13. I have never committed any criminal offenses and I was complying with all the rules and regulations imposed on people with F-1 status prior to being informed that my F-1 status had been terminated. I am not employed and I am a full-time student.

14. At the time that I was informed that my F-1 status had been terminated I was a full-time student in good standing at Indiana University Indianapolis.

15. I am a transgender female. Since I have been in Indianapolis, I have been receiving gender-affirming care through Eskenazi Health. I have been receiving estradiol (estrogen) since May of 2020 and spironolactone (to suppress testosterone) since May of 2020.

16. I receive medicine in pill form and I am required to take them every day. My treatment staff have told me that if I miss medication it may interfere with my transition.

17. I see my transgender treatment staff every three months and my mental health doctor every month.

18. I am required to have blood tests every three months to make sure that my hormones are at proper levels and to make sure that all else is well.

19. I have been diagnosed with gender dysphoria, a condition related to my transgender status. This is a condition that causes depression and anxiety.

20. On April 11, 2025, I received an email from the Director of International Student and School Services at Indiana University Indianapolis that states that:

A recent review of student records brought to our attention that your SEVIS record and lawful F-1 status in the United States was terminated yesterday, by the U.S. Department of Homeland Security. The reason for the termination listed in SEVIS is, 'OTHERWISE FAILING TO MAINTAIN STATUS – Individual identified in criminal records check and/or has had their VISA revoked. SEVIS record has been terminated.' The government has provided no further information about the reason for the termination of your F-1 SEVIS record.

If you are currently employed, you are advised to cease employment immediately.

This email is attached as Exhibit 1.

21. No further notice or explanation has been given for the termination of my F-1 status and I have received no notice from DHS or any other agency of the United States.

22. I do not believe that there are any grounds to terminate my previously lawful F-1 status.

23. The termination of my F-1 status means that I cannot continue my education in the United States and that I am subject to detention and removal. This is extremely problematic for many reasons.

24. First, if I am detained and placed in removal proceedings, my transgender care may be interrupted. This could be a problem as I need to receive my medications to continue my transition and to keep the levels of hormones in my blood at the correct level.

25. Additionally, I do not believe that I would receive comparable care in China to what I am receiving in Indiana. Generally, when a transgender person seeks gender-affirming hormones in China their parents must consent to the care for their child, even when the child is adult and I am not sure if my parents would consent. And doctors in China are more reluctant to provide gender-affirming medical care than in Indiana.

26. Moreover, the loss of my F-1 status means that I may never be able to complete my studies. I may wish to obtain an internship in the United States after my education to continue my career development, but right now I am focused on trying to finish my education.

27. My plan has been to obtain an internship in the United States after my education to continue my career development.

28. This will not be possible without my F-1 status.

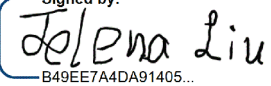
29. I am extremely nervous about my future. I am not leaving my home because I am concerned about the fact that I no longer have lawful status and may be subject to being detained.

30. This has greatly increased my anxiety and distress.

Verification

I verify under penalty of perjury that the foregoing statements that concern me are true and correct.

Date: 4/21/2025 | 11:43 AM EDT

Signed by:

B49EE7A4DA91405...
Jelena Liu

Prepared by:

Kenneth J. Falk
ACLU of Indiana

寄件者: Frame, Aliza Marie <almframe@iu.edu>

寄件日期: 2025年4月4日 07:46

收件者: Liu, Jelena <liu468@iu.edu>

主旨: Termination of your F-1 SEVIS record

Dear Jelena,

A recent review of student records brought to our attention that your SEVIS record and lawful F-1 status in the United States was terminated yesterday, April 3, 2025, by the U.S. Department of Homeland Security. The reason for the termination listed in SEVIS is, "OTHERWISE FAILING TO MAINTAIN STATUS - Individual identified in criminal records check and/or has had their VISA revoked. SEVIS record has been terminated." The government has provided no further information about the reason for the termination of your F-1 SEVIS record.

If you are currently employed, you are advised to cease employment immediately.

If you wish to discuss your options with an immigration attorney, we recommend that you consult an attorney who has specific experience with student immigration status and removal proceedings. You can locate an immigration attorney on the [AILA Immigration Lawyer Referral Service \(ailalawyer.com\)](https://ailalawyer.com).

Kindest regards,

Aliza

Aliza M. Frame

Pronouns: she/her/hers

Director of International Student and Scholar Services

Office of International Affairs

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EXHIBIT
1

Please note that my email address is changing to almframe@iu.edu. When the transition is complete, you will no longer be able to reach me at my old address. Please begin using my new address almframe@iu.edu now.



INDIANA UNIVERSITY
INDIANAPOLIS